

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**MICHAEL T. DREHER,**  
*Individually and on behalf of a  
class of similarly situated persons,*

**Plaintiff,**

**v.**

**CIVIL NO. 3:11-cv-00624-JAG**

**EXPERIAN INFORMATION SOLUTIONS, INC.,**

**Defendant.**

**PLAINTIFF'S THIRD SUPPLEMENTAL F.R.C.P. 26(a)(1) DISCLOSURES**

COMES NOW the Plaintiff, MICHAEL T. DREHER, by counsel, and pursuant to Fed. R. Civ. P. 26(a)(1), and makes the following supplemental disclosures to Defendant. These initial disclosures are based on information reasonably available to the Plaintiff at this time. Plaintiff reserves the right to supplement these initial disclosures (either through express supplements to these disclosures or through responses to formal discovery) when additional information becomes available.

In making these initial disclosures, Plaintiff does not waive the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay or any other proper ground to the use of any such information, for any purpose, in whole or in part, and this action or any other action. Plaintiff also does not waive the right to object to any request for production of any document, electronically stored information, or tangible thing on the basis of any privilege, the work product doctrine, evidentiary exclusion, relevancy, undue burden or any other proper ground.

## II. Description of documents in possession of the Plaintiff.

Other than those documents obtained from any Defendant in discovery, the Plaintiff has the following documents in his possession and control:

*Plaintiff's counsel will forward the supplemental Exhibits under separate cover to Defendant's counsel.*

Document Type	Bate Stamp #
LaPorte Savings Bank's Response to Subpoena Served by Plaintiff, Michael Dreher, documents and Authentication Affidavit	1 – 779
Mark L. Phillips and Newby, Lewis, Kaminski & Jones, LLP's Response to Subpoena served by Plaintiff, Michael Dreher, documents and Authentication Affidavit	1 – 1247

Plaintiff reserves the right to further supplement these disclosures.

**MICHAEL T. DREHER,**  
*Individually and on behalf of a  
class of similarly situated persons*

/s/

Leonard A. Bennett, Esq.  
VSB #37523  
Attorney for Plaintiff  
CONSUMER LITIGATION  
ASSOCIATES, P.C.  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, Virginia 23601  
(757) 930-3660 - Telephone  
(757) 930-3662 – Facsimile  
E-mail: [lenbennett@clalegal.com](mailto:lenbennett@clalegal.com)

Susan M. Rotkis  
VSB 40693  
Attorney for Plaintiff  
CONSUMER LITIGATION ASSOC., P.C.  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, Virginia 23601  
(757) 930-3660 - Telephone  
(757) 930-3662 – Facsimile  
E-mail: [srotkis@clalegal.com](mailto:srotkis@clalegal.com)

Kristi Cahoon Kelly, VSB #72791  
SUROVELL ISAACS PETERSEN &  
LEVY PLC  
4010 University Drive, 2nd Floor  
Fairfax, VA 22030  
Telephone (703) 277-9774  
Facsimile (703) 591-9285  
E-mail: [kkelly@sipfirm.com](mailto:kkelly@sipfirm.com)

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of September, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

David Neal Anthony  
Troutman Sanders LLP  
Troutman Sanders Bldg  
1001 Haxall Point  
PO Box 1122  
Richmond, VA 23219  
Email: [david.anthony@troutmansanders.com](mailto:david.anthony@troutmansanders.com)

Joseph William Clark  
Jones Day  
51 Louisiana Avenue NW  
Washington, DC 20001  
E-mail: [jwclark@jonesday.com](mailto:jwclark@jonesday.com)

/s/

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Leonard A. Bennett, Esq.  
VSB #37523  
Attorney for Plaintiff  
CONSUMER LITIGATION  
ASSOCIATES, P.C.  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, Virginia 23601  
(757) 930-3660 - Telephone  
(757) 930-3662 – Facsimile  
[lenbennett@clalegal.com](mailto:lenbennett@clalegal.com)